

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG, INC., Plaintiff,

VS.

FRONTIER COMMUNICATIONS
CORPORATION, LOCAL.COM
CORPORATION, DEX ONE
CORPORATION, WIND STREAM
COMMUNICATIONS, INC., YELLOW
BOOK USA, INC., INTELLIUS, INC.,
CENTER'D CORPORATION, IDC
NETWORKS, INC., G02 MEDIA, INC.,
HELLOMETRO INCORPORATED,
MAGICYELLOW, INC., SOLFO, INC.,
YELP!, INC. and CITYGRID MEDIA, LLC

Defendants.

CIVIL ACTION NO.: 2:10-cv-00265-TJW

**DECLARATION OF EMAD FANOUS IN SUPPORT OF SOLFO, INC.'S MOTION TO
DISMISS FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE OR,
IN THE ALTERNATIVE, TO TRANSFER VENUE**

I, EMAD FANOUS, being duly sworn, depose and say:

1. I am over the age of 18 years and I am the Vice-President, and a Director of SOLFO, Inc. (“SOLFO”), a named defendant in the above-referenced proceeding. In addition, I am the Director of Technology of SOLFO. I make this declaration in support of SOLFO’s Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, in the Alternative, to Transfer Venue. I have personal knowledge of all facts stated herein and all such facts are true and correct.

2. I was personally involved in the design and development of the search engine and the database for the website yellowbot.com. In addition, Ask Bjorn Hansen assisted me in the database setup. Graham Barr was not involved in either the initial design or the development of the search engine or database. Mr. Barr was primarily involved in the loading of data which we received via various data feeds.

3. I reside in Los Angeles County in the state of California which is in the Central District of California. Mr. Hansen also resides in Los Angeles County, California.

4. I ran various queries related to yellowbot.com to determine the number of business listings on yellowbot.com in the counties comprising the Central District of California. The results of those queries establish that there are currently 1,078,701 business listings in the Counties of California comprising the Central District of California, and there were 2,044 reviews, 4,496 tags, 1614 photographs, and 60 videos posted with respect to those businesses. In addition, there were 9,227,570 page views in 2010 for businesses located in California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on this 15 day of February, 2011, at Burbank, California.



EMAD FANOOS

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

February 17, 2011

/s/ Robert W. Denton
Robert W. Denton